

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:)	Case No. 17-10514-TPA
)	
B.L. GUSTAFSON, LLC,)	Chapter 11
Debtor)	
)	
FORD MOTOR CREDIT)	
COMPANY, LLC,)	
Movant)	Related to Doc. Nos. 67 and 69
)	
vs.)	
)	
B.L. GUSTAFSON, LLC,)	Date and Time of Hearing:
Respondent)	December 7, 2017 at 10:00 a.m.

DEBTOR'S OBJECTION TO MOTION FOR RELIEF FROM AUTOMATIC STAY

AND NOW, this 13th day of November, 2017, comes the Debtor, by and through its counsel, Knox McLaughlin Gornall & Sennett, P.C., with this Answer and Objection to the Movant's Motion for Relief from Automatic Stay, as follows:

FIRST DEFENSE

Paragraphs 1, 2, 3, 4, 5, 6, 7 and 8 are admitted. Paragraph 9 is denied.

SECOND DEFENSE

10. The Movant is adequately protected by the value of its collateral. According to paragraph 6 of the Motion, the amount of the debt is \$6,698.12 plus interest from April 27, 2017. According to paragraph 8 of the Motion, the property has an NADA value of \$25,975.

THIRD DEFENSE

11. The involved property is valuable and is necessary to the effective reorganization of the Debtor.

FOURTH DEFENSE

12. The Debtor is willing to begin immediately making monthly payments in accordance with the contract.

WHEREFORE, the Debtor requests that the Motion be denied; and, that the Debtor have such other and further relief as is reasonable and just.

Respectfully submitted,

KNOX McLAUGHLIN GORNALL &
SENNETT, P.C.
Attorneys for Debtor

By: /s/ Guy C. Fustine
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 13th day of November, 2017, a copy of the Answer and Objection to the Movant's Motion for Relief from Automatic Stay was served by first class, United States mail, postage pre-paid, and/or electronic service as set forth on the attached service list.

Respectfully submitted,

KNOX McLAUGHLIN GORNALL &
SENNETT, P.C.
Attorneys for Debtors

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SERVICE LIST

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U.S. Steel Tower
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Pittsburgh, PA 15219

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Via CM/ECF:

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